

EPA Region 5 Records Ctr.



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DATE: November 27, 1985

TO: Enforcement Division - Steve Ewart, Senior Atty/Div. DWPC

FROM: Region 1 - Charles Corley *CCorley*

SUBJECT: ROCKFORD PRODUCTS CORPORATION, Plant 3
Rockford, IL - Winnebago County

The following is a brief summary of the justification of including violations of the Environmental Protection Act and Illinois Water Pollution Rules and Regulations in any enforcement action pertaining to Rockford Products, Plant 3.

HISTORY

Rockford Products Corporation, Plant 3 (RPC) was issued a Water Pollution Permit in 1984 in order to restrict the polluttional discharges to the seepage pond on their property. The pond has historically been the only means of disposing of storm water since the property is too low to connect to a city storm sewer by gravity. All manner of wastes (except pretreated plating wastes) have been allowed to enter the pond in the past. Oils, incinerator ash, abrasives, contaminated run-off, etc. have all been disposed there.

Between 1982-1984 Rockford Products Corporation began a clean-up of the pond, removing all these materials and hauling them away. Some went to a landfill while a great deal of the ash and contaminated sand and soil went across the street to fill a foundation under a new building.

Clean-up was mostly completed before the Division of Water Pollution Control became aware of the seepage pond. In order to prohibit recurrence of past practices, and to gain information on the effects of past and current discharges (storm water and any others), the Water Pollution Control Permit was issued. The conditions require periodic monitoring of the discharge and the groundwater.

WATER POLLUTION VIOLATIONS

Contamination of the cooling water and/or rainwater discharges to the pond as the result of venting solvent vapors is clearly a violation of the Act and Water Pollution Regulations. The vented vapors are a waste as defined by both the Act and Water Pollution Regulations (see highlighted attachments).

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NOV 05 1985

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State of Illinois

November 27, 1985

Page 2

The solvent vapors are "contaminants" as defined in the Act and as such, when present in the seepage pond and groundwater violates the Act and Sections 302.105 and 302.203 of the Water Pollution Regulations. The existence of an Air Pollution Control Permit to emit vapors does not relieve Rockford Products Corporation of the duty to do so without causing "Water Pollution".

WATER POLLUTION CONTROL PERMIT VIOLATIONS

Rockford Products Corporation has not fulfilled the permit requirement of installing groundwater monitoring wells as prescribed (1 upgradient and 2 downgradient).

If you have any questions, please feel free to call.

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cc: DWPC/FOS & Records Unit ✓
Rockford Office